

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

TIMOTHY KLICK,

*Plaintiff,*

v.

CENIKOR FOUNDATION,

*Defendant.*

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Civil Action No. 4:19-cv-01583  
(consolidated with Civil Action Nos.  
4:19-cv-03033, 4:19-cv-03032,  
4:19-cv-03031, 4:19-cv-04569)

**JOINT MOTION FOR ENTRY OF  
PROPOSED SCHEDULING/DOCKET CONTROL ORDER**

In accordance with the Court's Agreed Order signed November 5, 2024, Plaintiffs in the Consolidated Cases (defined as Civil Action Nos. 4:19-cv-01583, 4:19-cv-03033, 4:19-cv-03032, 4:19-cv-03031, and 4:19-cv-04569) and Defendant Cenikor Foundation ("Defendant") hereby submit this Joint Motion for Entry of Scheduling/Docket Control Order and respectfully request that the Court enter the proposed Scheduling/Docket Control Order attached hereto as Exhibit A.

Dated: November 19, 2024

Respectfully submitted,

LOCKE LORD LLP

By: /s/ David M. Gregory

David M. Gregory

Texas State Bar No. 24007274

Southern District ID No. 24397

600 Travis Street, Suite 2800

Houston, Texas 77002

dgregory@lockelord.com

Tel: (713) 226-1344

Fax: (713) 223-3717

**ATTORNEY-IN-CHARGE FOR  
DEFENDANT**

Christopher Dove  
Texas State Bar No. 24032138  
Southern District ID No. 37989  
Andrew W. Reed  
Texas State Bar No. 24074935  
Southern District ID No. 1140192  
Kathleen Grossman  
Texas State Bar No. 24109949  
Southern District ID No. 3399013  
LOCKE LORD LLP  
600 Travis Street, Suite 2800  
Houston, Texas 77002-3095  
Telephone (713) 226-1200  
Facsimile (713) 223-3717  
cdove@lockelord.com  
andrew.reed@lockelord.com  
kathleen.grossman@lockelord.com

Frank Sommerville  
Texas State Bar No. 18842700  
Southern District ID No. 9748  
WEYCER, KAPLAN, PULASKI & ZUBER, P.C.  
3030 Matlock Rd., Suite 201  
Arlington, Texas 76015  
Telephone (817) 795-5046  
Facsimile (800) 556-1869  
fsommerville@wkpz.com

**OF COUNSEL FOR DEFENDANT**

**CERTIFICATE OF CONFERENCE**

I certify that on November 18, 2024, I conferred with Mr. Doug Werman via email (with counsel for all Plaintiffs in the Consolidated Cases copied on the email), regarding this Joint Motion and the corresponding proposed Scheduling/Docket Control Order. Mr. Werman informed me that Plaintiffs in the Consolidated Cases are in agreement with the terms of the Joint Motion and the corresponding Scheduling/Docket Control Order.

/s/ David M. Gregory

David M. Gregory

**CERTIFICATE OF SERVICE**

I certify that a copy of this Joint Motion and proposed Scheduling/Docket Control Order was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to counsel for the Plaintiffs by operation of the Court's electronic filing system.

/s/ David M. Gregory

David M. Gregory